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December 18, 2002

BY ELECTRONIC FILING

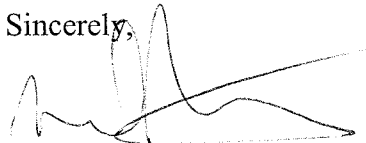
Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: *Written Ex Parte Presentation*
In the Matter of Performance Measurements and Standards for
Interstate Special Access Services, CC Docket No. 01-321

Dear Ms. Dortch:

On December 18, 2002, the Joint Competitive Industry Group submitted a written ex parte presentation to William Maher regarding the above-referenced docket. Pursuant to section 1.1206(b)(2) of the Commission's rules, 47 C.F.R. § 1.1206(b)(2), this letter is being provided to you for inclusion in the public record of the above-referenced proceeding.

Sincerely,

A handwritten signature in black ink, appearing to read 'Gil Strobel', with a long horizontal flourish extending to the right.

Gil Strobel

Attachments

cc: Scott Bergmann
Jeffrey Carlisle
Michelle Carey
William Maher
Uzoma Onyeije
John Stanley

December 18, 2002

BY ELECTRONIC FILING

William Maher
Chief, Wireline Competition Bureau
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: In the Matter of Performance Measurements and Standards for Interstate
Special Access Services, CC Docket No. 01-321

Dear Mr. Maher:

On January 22, 2002, the Joint Competitive Industry Group (JCIG) filed a set of proposed Performance Measurements & Standards to be applied to the provision of all interstate special access services by Tier 1/Class A incumbent LECs.¹ Since JCIG filed its Proposal with the FCC, at least three state commissions have either adopted the JCIG proposal, or adopted performance measurements very similar to those proposed by JCIG.² Most recently, the Georgia Public Service Commission (PSC) adopted JCIG's proposed measures as part of an ongoing effort to ensure that BellSouth provides adequate service to its customers in Georgia.³ A copy of the Georgia PSC's Order is enclosed for your convenience.

JCIG continues to urge the FCC to adopt the Group's proposal as expeditiously as possible. As JCIG has previously explained, and several state commissions have now found,

¹ See Attachment A to Letter to Chairman Michael K. Powell, FCC, from JCIG, CC Docket No. 01-321 (Jan. 22, 2002).

² See Letter to Dorothy Attwood, FCC from JCIG, CC Docket No. 01-321, attaching the Minnesota and Tennessee Orders (June 18, 2002).

³ See *Performance Measures for Telecommunications Interconnections, Unbundling and Resale*, Order Adopting Changes to Performance Measures, Georgia PSC Docket No. 7892-U, at 5-6 (Nov. 14, 2002). On December 17, 2002, the Georgia PSC voted unanimously to deny BellSouth's petition for reconsideration of this order.

adoption of the JCIG measurements remains the best way to ensure that incumbent LECs provide their special access customers with just, reasonable and nondiscriminatory service.

Respectfully submitted,

The Joint Competitive Industry Group

C. Douglas Jarrett
Keller and Heckman LLP
American Petroleum Institute

Brian Moir
Moir & Hardman
**eCommerce & Telecommunications Users
Group (eTUG)**

John Windhausen, Jr., President
**Association for Local Telecommunications
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Richard J. Metzger
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Robert W. Quinn, Jr.
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Donna Sorgi
Vice President, Federal Advocacy
Law and Public Policy
WorldCom, Inc.

Audrey Glenn
Director, Domestic Regulatory Affairs
Cable & Wireless

R. Gerard Salemmme
Senior Vice President, External Affairs
XO Communications, Inc

H. Russell Frisby, Jr., President
**Competitive Telecommunications
Association**

Attachment

DOCKET NO. 7892-U

**In Re: Performance Measures for Telecommunications Interconnection,
Unbundling and Resale**

Order Adopting Changes to Performance Measures

BY THE COMMISSION:

On August 7, 2002, the Staff of the Georgia Public Service Commission (“Commission”) filed its recommendations on changes to the performance measures for BellSouth Telecommunications, LLC (“BellSouth”) adopted by the Commission on January 16, 2001. Staff’s August 7, 2002 recommendations are attached as Exhibit 1 to this order. BellSouth, the CLEC Coalition, Time Warner Telecom of Georgia, LP and US LEC of Georgia, Inc. filed comments with the Commission in response to Staff’s recommendation.

I. INTRODUCTION

A. Background

On January 16, 2001, the Commission established generic performance measurements for BellSouth Telecommunications, Inc., for interconnection, unbundling and resale as well as appropriate enforcement mechanisms for those performance measurements. The Commission order provided for a six-month review of the service quality measurements (“SQMs”). (Order, p. 29). The Staff has conducted an ongoing review of the SQMs, conducted workshops involving interested parties and reviewed written comments from the parties.

B. Jurisdiction

The Commission has general authority and jurisdiction over the subject matter of this proceeding, conferred upon the Commission by Georgia's Telecommunications and Competition Development Act of 1995 (Georgia Act), O.C.G.A. §§46-5-160 *et seq.*, and

generally O.C.G.A. §§ 46-1-1 *et seq.*, 46-2-20, 46-2-21, and 46-2-23. Under the Federal Telecommunications Act of 1996 (Federal Act), State Commission's are also authorized to set terms and conditions for interconnection and access to unbundled elements pursuant to Sections 251 and 252 of the Federal Act.

The Commission Staff reviewed the comments of the parties and modified its August 7, 2002 recommendation as follows:

II. FINDINGS OF FACT AND CONCLUSIONS OF LAW

A. Late and Incomplete Reports

Staff recommended that BellSouth not be penalized for "revised Service Quality Measurement ("SQM") and SEEM" reports.

B. O-3 (Percent Flow-Through Service Requests (Summary))

Staff recommended that this measure maintain its transaction-based methodology with penalties of \$100 per transaction.

C. O-4 (Percent Flow-Through Service Requests (Detail))

Staff recommended that the chart on percent flow through in its August 7, 2002 recommendation be amended to reflect the dollar amounts in the chart below:

	Month 1	Month 2	Month 3	Month 4	Month 5	Month 6
Flow-through	\$80	\$90	\$100	\$110	\$120	\$130

D. O-8 (Reject Interval) and O-9 (Firm Order Confirmation)

Staff maintained its recommendation that the Commission reduce the benchmark from 85% within ten hours to 90% within seven hours for partially mechanized Local Service Requests ("LSRs"). However, the Staff modified its earlier recommendation to delete the following language: "and 90 days thereafter, (the benchmark will reduce) to 90% within 5 hours."

For non-mechanized LSRs, Staff recommended that the Commission reduce the benchmark to 95% within 24 hours instead of its previously recommended benchmark of

90% within 10 hours.

E. O-16 (CLEC Ordering Trouble Responses in 48 Hours)

In its comments, BellSouth stated that the Staff's recommended measure was poorly defined, would be difficult to measure, and was not responsive to a clearly demonstrated problem. (BellSouth Comments, pp. 10-13). The Staff agreed with these comments and recommended that the measure be deleted.

F. P-3 (Percent Missed Installation Appointments)

BellSouth stated that the "ADSL (Industrial) Provided to Retail" is not the appropriate analog for Line Sharing and Line Splitting. (BellSouth Comments, pp. 13-14). Staff agreed with the comments and modified its August 7, recommendation. Staff's modified recommendation was for the Commission to adopt an "ADSL to Retail" analog, which would provide a more suitable comparison.

G. P-4 (Average Completion Interval & Order Completion Interval)

BellSouth argued that Staff's August 7, recommendation could result in duplicative penalties should BellSouth fail to meet the P-4 measurement as a consequence of failing to meet the O-9 measurement. While Staff noted that the modified version of P-4 will provide useful information in terms of evaluating the customer experience, Staff agreed with BellSouth's contention. Therefore, Staff recommended that BellSouth continue to measure the current P-4, and in addition, that BellSouth *also* measure the modified P-4. Staff recommended that the current measure be known as P-4A and the modified measure, P-4B. The Staff recommended that remedies only be due on P-4A at this time.

Additionally, Staff recommended that the UNE Enhanced Extended Links ("EELs") (Non switched combinations) measure be added to P-4A (Order Completion Interval), O-9 (Firm Order Confirmation) and the SEEM plan. The Staff further recommended that the benchmark for EELs under O-9 shall be the same as other Unbundled Network Elements under this measure. The Benchmark for P-4A is 30% within 5 days and 70% within 8 days.

H. P-7C (Hot Cut Conversions - Percent Provisioning Troubles Within 7 Days Of A Completed Service Order)

Staff agreed with BellSouth that the current exclusion should be clarified to include "CLEC Equipment Trouble," and modified its recommendation accordingly.

I. P-9 (Percent Provisioning Troubles Within 30 Days Of Service Order Completion)

Staff agreed with BellSouth that the current exclusion should be clarified to include "CLEC Equipment Trouble," and modified its recommendation accordingly.

J. P-11 (Service Order Accuracy)

Currently, BellSouth calculates service order accuracy using a statistically valid sample. BellSouth proposed that as an alternative to this method, it could "implement a mechanized process by which each eligible partially mechanized LSR would be reviewed and compared against the corresponding service order in calculating BellSouth's service order accuracy results." (BellSouth Comments, p. 22). Staff's August 7, recommendation was for BellSouth to conduct both analyses. In its modified recommendation, Staff recommended that the Commission adopt the alternative proposed by BellSouth.

BellSouth also requested that the Staff modify P-11 in the following three ways: (1) That fields reviewed in determining service order accuracy be limited to CLEC-impacting. (2) That disaggregation be based on three categories of products: Resale, UNEs, and UNE-P. (3) That the benchmark for P-11 be reduced from 95% to 90%. Staff agreed with these proposed modifications and recommended that the Commission adopt these modifications.

K. P-15 (Premature Disconnects - Loop Port Combos)

Staff agreed with BellSouth that this measure is obsolete and should be eliminated from the SQM, and modified its recommendation accordingly.

L. C-2 (Collocation Average Arrangement Time)

Under the current C-2 measure, the clock for BellSouth performance begins "on the date that BellSouth receives an accurate Bona Fide firm order accompanied by the appropriate fee." BellSouth argued this was appropriate because it tracks BellSouth's obligation starting when it receives a valid collocation request. (BellSouth Comments, p. 25). The Staff agreed and modified its recommendation accordingly.

M. CM-6, CM-7, CM-8

BellSouth stated in its comments that "because there are slight differences in the language of Measures CM-6, CM-7, and CM-8 as proposed by the parties in Georgia earlier this year versus the language in the corresponding measures (already in place) in Florida, BellSouth recommends that the Florida version of these measures be included in the Georgia SQM." (BellSouth Comments, p. 27). Staff agreed and recommended that the Commission adopt the language approved in Florida.

N. CM-10

BellSouth recommended "that Measure CM-10, which also was adopted by the

Florida Commission, be included in the Georgia SQM as well.” (BellSouth Comments, p. 27). Staff modified its recommendation to include CM-10 in the SQM. Also, BellSouth recommended that "Consistent with the Florida Commission's recent decision, Measure CM-11 should be added to the Georgia SEEM plan as well.” (BellSouth Comments, Footnote 5). Staff recommended that the Commission adopt CM-11 in the SEEM plan.

O. Special Access Metrics

On January 22, 2002, the Joint Competitive Industry Group filed with the FCC a Proposal Regarding Performance Metrics and Installation Intervals for Interstate Special Access Services.¹ Staff recommended that the Commission adopt the Joint Competitive Industry Group measures (Exhibit 2) in lieu of the measures previously recommended.

P. Implementation Date

BellSouth contended that an implementation date of 30 days from the date of a Commission order did not allow sufficient time for BellSouth to implement all of the changes involved in the Performance Measures Review. (BellSouth Comments, p. 33). Given the large number of recommended changes, Staff recommended that the implementation date be extended to 90 days from the date of a Commission Order approving the revised SQM.

Q. Administrative Changes

Exhibit 3 to BellSouth's Comments detailed Administrative Changes. Staff recommended approval of all of the Administrative Changes, except the last item in the matrix regarding analogs and benchmarks for product "roll-up" categories. Staff recommended that BellSouth be required to provide as an attachment to the SQM document the product "roll-up" lists for the measures included under SEEM disaggregation, SEEM analog/ benchmark and SQM analog/ benchmark.

R. Tier 2 Penalties

Staff recommended that the Commission require BellSouth to file a detailed accounting of the Tier 2 penalties due to this Commission for Late and Incomplete SQM reports on October 1, 2002. Staff also recommended that the Commission require BellSouth to list the penalty ordered for P-11 (Service Order Accuracy) as part of the accounting. Staff will review this report and recommend to BellSouth on how to proceed.

The Commission finds the Staff's recommendations reasonable as amended. While the details of the Staff's recommendation changed in response to the parties comments, the goals remained the same. In adopting performance measures, the

¹ On January 29, 2002, WorldCom, Inc. filed the Proposal with the Georgia Public Service Commission.

Commission must strike a balance. The measures have to be aggressive enough to provide BellSouth with a strong incentive to continue improving its performance, but not so extreme as to result merely in penalties without any corresponding performance improvements. The Staff's recommendations strike that balance. The Commission adopts Staff's recommendation as amended.

S. Change Control Process

The purpose of a change control process (CCP) is to maintain nondiscriminatory operational support systems (OSS). A CCP addresses the process of making changes to OSS, the documentation and testing of changes prior to implementation and the correction of defects after implementation.

On January 30, 2002, the CLEC Coalition filed a redlined version of BellSouth's CCP. In addition to the redlined version, the CLEC Coalition provided written comments that asserted BellSouth's existing CCP was substantially flawed. The CLEC Coalition claimed that under the existing CCP, BellSouth takes too long to process changes, that BellSouth implements too few of the change requests, that the prioritization process needs improvement, that the scope of the CCP needed to be broadened and clarified, and that the testing process needs improvement. (CLEC Coalition Comments, pp. 2-9). BellSouth responded to the CLEC Coalition's filings on February 15, 2002. While stating that it was working with various CLECs on the CCP and could agree with some suggested changes, BellSouth maintained that the CLEC Coalition's proposals went beyond the intentions of a CCP and amounted to turning control of BellSouth's business over to CLECs. (BellSouth's Comments, p. 1).

On July 5, 2002, the CLEC Coalition filed another version of the CCP with both red (CLEC language) and green (BellSouth language) lines to highlight the remaining areas of disagreement. The Commission Staff reviewed the various filings and presented the following recommendation to the Commission at the September 17, 2002 Administrative Session.

Item	CCP Section	Status Page	Staff Recommendation
1	2.0 – 4 th Para	D 21	<p>Staff recommends that the following language proposed by BellSouth be included in the Change Control Process: The Candidate Change Requests are used as input to the Internal Change Management Processes (refer to process Step 7 for Types 2-5 changes) for scheduling CLEC Production Releases.</p> <p>In addition, Staff recommends the following terms and conditions: (1) A 50%- 50% capacity split for BellSouth and CLEC Production Releases. (2) All Change Requests (CRs) shall be submitted to the CCP before prioritization (Type 2, 4, 5 and 6). (3) BellSouth's Production release shall not be subject to CLEC prioritization. (4) BellSouth shall hire a third</p>

Item	CCP Section	Status Page	Staff Recommendation
			party to ensure that the 50-50 plan and all the approved changes are implemented as ordered by the Commission.
2	2.0 - DCCoM	D 22	As a result of Item 1, CLECs will obtain prior notice through the CCP of all CRs, including BellSouth initiated CRs, before prioritization and implementation in all production releases; therefore the Staff recommends adoption of BellSouth's position that a Designated CLEC Co-Moderator is not appropriate since BellSouth still needs to conduct internal meetings to run its business without CLEC participation.
3	3.0 – Type 2	D 23	<p>Staff recommends the following language proposed by CLECs be included in the Change Control Process: When the mandate does not include a specific implementation date the intervals described below for the implementation of Type 4 and Type 5 changes will apply.</p> <p>In addition, Staff recommends the following terms and conditions: (1) Type 2 CRs with no regulatory deadline shall be implemented within 60 weeks after prioritization. (2) With mutual consent by participants, Type 2 CRs may be managed using the Expedited Feature Process.</p> <p>(3) The 60 week prioritization mandate shall begin the date of the next CLEC prioritization.</p>
4	3.0 – Type 4 1 st Paragraph	D 24	Staff recommends the following language be included in the Change Control Process: The implementation of Type 4 changes will occur within (no later than) 60 weeks from prioritization of the changes.
5	3.0 – Type 4 2 nd Paragraph	D 24	Staff recommends the following language be included in the Change Control Process: Prioritization ranking and BellSouth preliminary feature sizing model information will be used to sequence the implementation of changes in the CLEC Production Releases that will occur during the 60-week interval. The prioritization ranking provides the CLEC's evaluation of the relative business value/urgency of the change and the sizing information provides the relative estimated anticipated work effort required.
6	3.0 – Type 4 3 rd Paragraph	D 24	Staff recommends the following language proposed by BellSouth be included in the Change Control Process: With mutual consent by the participants, Type 4 changes within the CLEC Production Releases may be managed using the Expedited Feature Process, as discussed in Section 4.0, Part 3.
7	3.0 – Type 5 1 st Paragraph	D 25	Staff recommends the following language proposed by CLECs be included in the Change Control Process: The implementation of Type 5 changes will occur within (no later than) 60 weeks from prioritization of the change, unless a

Item	CCP Section	Status Page	Staff Recommendation
	h		Negotiated Extended Implementation Interval has been agreed to.
8	3.0 – Type 5 2 nd Paragraph	D 25	Staff recommends the following language be included in the Change Control Process: Prioritization ranking and BellSouth preliminary feature sizing model information will be used to sequence the implementation of changes in the CLEC Production Releases that will occur during the 60-week interval. The prioritization ranking provides the CLEC's evaluation of the relative business value/urgency of the change and the sizing information provides the relative estimated anticipated work effort required.
8a	3.0 – Type 6 2 nd paragraph	D 25	Staff recommends the following: (1) Type 6 Defect definition stays the same. (2) BellSouth shall track these defects to determine how frequently Type 6 Change Requests are a result of non-coding errors. (3) The Defect Correction intervals are as follows: Medium Impact: 30 Business days. Low Impact: 45 Business days.
9	3.0 – Type 6	D 25-26	The Staff's recommendation is the same as for Item 8a.
10	4.0 – Part 1 – Step 2 Outputs	O 32	This item is still being discussed among the parties.
11	4.0 – Part 2 – Step 4, Act #5 (BCCM)	D 39	Staff recommends the following language proposed by CLECs be included in the Change Control Process: Provide Preliminary Feature Sizing Model and scope information on each pending change request and all future releases to CLECs. This sizing is expressed in "units" with a unit being equal to 100 release cycle hours. A release cycle hour is the total number of hours estimated for planning, analysis, design, code development, testing, and implementation of a single CR. Appendix I-A will be used to provide future release capacity sizing information. In addition, Staff recommends the following terms and conditions: BellSouth shall use the Revised Form I-A titled "Reporting Pre-Release Estimated Capacity Forecasting/Used for Capacity Planning Only." (Exhibit 3)
12	4.0 – Part 2 – Step 4 – Note after Act #3 (CCCM)	D 39	Staff recommends the following language proposed by CLECs be included in the Change Control Process: CLECs will be notified of release capacity units and units assigned per CR.

Item	CCP Section	Status Page	Staff Recommendation
13	4.0 – Part 2 – Step 4 - Inputs	D 40	Staff recommends the following language proposed by CLECs be included in the Change Control Process: BST Preliminary Feature Sizing Model and full release capacity.
14	4.0 – Part 2 – Step 4 - Outputs	D 40	Staff recommends the following language proposed by CLECs be included in the Change Control Process: Provide BST Preliminary Feature Sizing Model and scope information on each Pending change request and all future releases to CLECs.
15	4.0 – Part 2 – Step 5 – Prioritization Meeting	D 40	Staff recommends that the language stay the same.
16	4.0 – Part 2 – Step 5, Act #3	D 41	Staff recommends the following language proposed by CLECs be included in the Change Control Process: BellSouth presents the number of production releases and dates targeted for the (CLECs) remainder of the current and next calendar year next 12 months. (CLECs) BellSouth presents the total capacity (units) of each release and the capacity available (units) for the implementation of the change requests.
17	4.0 – Part 2 – Step 5, Act #6	D 41	Staff recommends the following language be included in the Change Control Process: Develop final Candidate Request list of Pending Change Requests by category, “Need by Dates” and prioritized Change Requests for the CLEC Production Release being scoped. The CLEC’s prioritization will be used for order of implementation into this CLEC Production Release. The order of implementation may be altered only with CLEC concurrence.
18	4.0 – Part 2 – Step 5 - Inputs	D 42	Staff recommends the following language proposed by CLECs be included in the Change Control Process: Provide Preliminary feature sizing model and scope information on each pending change request and all future releases to CLECs.
19	4.0 – Part 2 – Step 5 - Outputs	D 42	Staff recommends the following language proposed by CLECs be included in the Change Control Process: Assignment of Candidate Change Requests to future releases.
20	4.0 – Part 2 – Step 6 - Inputs	D 42	Staff recommends the following language proposed by CLECs be included in the Change Control Process: Prioritized Assignments to Future Releases
21	4.0 – Part 2 –	D 42	Staff recommends adoption of BellSouth’s position that a Designated CLEC Co-Moderator is not appropriate since

Item	CCP Section	Status Page	Staff Recommendation
	Step 7 - DCCoM		BellSouth still needs to conduct internal meetings to run its business without CLEC participation.
22	4.0 – Part 2 – Step 7, Act #2	D 43	Staff recommends adoption of BellSouth's position that this step is not necessary since BellSouth will implement CLEC requested features in CLEC Production Releases as guided by the CLEC's prioritization.
23	4.0 – Part 2 – Step 7, Act #3	D 43	Staff recommends adoption of BellSouth's position that a Designated CLEC Co-Moderator is not appropriate since BellSouth still needs to conduct internal meetings to run its business without CLEC participation.
24	4.0 – Part 2 – Step 7, Act #4 1 st Paragraph	D 43	Sizing and sequencing of prioritized change requests will begin with the top priority items and continue down through the list.
25	4.0 - Part 2 -Step 7, Act #4 2 nd Paragraph	D 43	Staff recommends the following language be included in the Change Control Process: Develop final Candidate Request list of Pending Change Requests by category, "Need by Dates" and prioritized Change Requests for the CLEC Production Release being scoped. The CLEC's prioritization will be used for order of implementation into this CLEC Production Release. The order of implementation may be altered only with CLEC concurrence.
26	4.0 – Part 2 – Step 7, Act #5	D 43	Staff recommends the following language be included in the Change Control Process: The implementation of Type 4 and Type 5 changes will occur within (no later than) 60 weeks from prioritization of the change. Prioritization ranking and BellSouth preliminary feature sizing model information will be used to sequence the implementation of changes in the CLEC Production Releases that will occur during the 60-week interval. The prioritization ranking provides the CLEC's evaluation of the relative business value/urgency of the change and the sizing information provides the relative estimated anticipated work effort required.
27	4.0 – Part 2 – Step 10, Act #4	D 46	Staff recommends the following language proposed by CLECs be included in the Change Control Process: The estimated units of effort will be provided via Appendix H.

Item	CCP Section	Status Page	Staff Recommendation
28	4.0 – Part 3 – Header & 1 st Paragraph	D 48	<p>Staff recommends the following header proposed by CLECs be included in the Change Control Process: Part 3: Exception Feature Process</p> <p>Staff recommends that the following language proposed by CLECs be included in the Change Control Process: Situations may arise from time to time that require exception treatment for Type 2-5 changes or a Type 6 Defect change that has been reclassified as a feature change request. An exception may involve an Expedited Feature, a Re-classified Defect, or a Negotiated Extended Implementation.</p> <p>Staff recommends that the header for the second paragraph under Definition in this section be entitled, “Expedited Feature”.</p>
29	4.0 – Part 3 – Expedited Feature – 2 nd Bullet	D 48	<p>Staff recommends that the following language proposed by BellSouth be included in the Change Control Process: An enhancement to an existing interface where the CLECs have determined should be expedited due to impact. Applicable to CLEC Production Releases.</p>
30	4.0 – Part 3 – Negotiated Extended Implementation	D 48	<p>Staff recommends that the following language proposed by CLECs be included in the Change Control Process: <u>Negotiated Extended Implementation</u></p> <p>The CLECs and BellSouth collectively may determine that an individual or group of normally prioritized change requests should not be implemented within the normal 60-week interval. A negotiated extended implementation may be requested. As each situation will likely be unique, this process provides the framework in which the CCP member will make the necessary consensus decisions to achieve a negotiated implementation. See Figure 4-X for high-level process overview.</p>
31	4.0 – Part 3 – Enhancement – 4 th Bullet	D 49	<p>Staff recommends the following language proposed by BellSouth be included in the Change Control Process: Applicable for CLEC Production Releases.</p>
32	4.0 – Part 3 –	D 40-	<p>Staff recommends the following language proposed by CLECs be included in the Change Control Process: Figure 4-X: Process</p>

Item	CCP Section	Status Page	Staff Recommendation
	Figure 4-X: Negotiated Extended Imp. Feature Process	50	Flow for Types 2-5 Negotiated Extended Implementation Feature Process
33	4.0 – Part 3 – Step 3A	D 55	Staff recommends that the following language proposed by BellSouth be included in the Change Control Process: Change requests validated in Step 2 above shall be considered for expedited status into the next CLEC Production Release by the CCP participants at the next Monthly Status Meeting. Requests granted expedited status by the consensus of the participants will continue through Step 4 and 5 to implementation. If the request is not granted expedited status, it will exit this process and enter the standard Types 2-5 flow, Step 4.
34	4.0 – Part 3 – Step 4, Act #2	D 55	Staff recommends adoption of BellSouth's position that a Designated CLEC Co-Moderator is not appropriate since BellSouth still needs to conduct internal meetings to run its business without CLEC participation.
35	5.0 – 3 rd Paragraph	D 57	Staff recommends that the language stay the same.
36	5.0 – Medium	D 57	The Staff's recommendation is the same as for Item 8a.
37	5.0 – Low	D 58	The Staff's recommendation is the same as for Item 8a.
38	5.0 – Step 5 Cycle Time	D 65	The Staff's recommendation is the same as for Item 8a.
39	6.0 – Part 1 - NOTE	D 71	Staff recommends that the language stay the same.
40	6.0 – Part 2 4 th & 5 th bullets	D 71-72	Staff recommends that the following language proposed by CLECs be included in the Change Control Process for bullet number 4: BellSouth's preliminary units estimate of: 1) feature release capacity available and 2) capacity assigned to known feature changes.

Item	CCP Section	Status Page	Staff Recommendation
			Use revised Appendix I-A.
40a	6.0 – Part 2 5 th bullet	D 72	Staff recommends that the following language proposed by CLECs be included in the Change Control Process: Schedule of Releases and estimated size (i.e. total units and units available for each type of change. See Appendix I-A for information to be provided.
41	6.0 – Part 2 – Bullets 7-10	D 72	<p>Staff recommends the following language for bullets 7-10 be included in the Change Control Process:</p> <ul style="list-style-type: none"> • For prioritization and planning purposes, BellSouth will provide two views of a rolling release plan annually: 1) a view with an industry release (i.e., ELMSx), CLEC production release(s) and BST production release(s) and 2) a view with a CLEC production release(s) and BST production release(s) and no industry release. The CCP membership will vote on which rolling release plan will be implemented for the following year.² • Total CLEC and BST production releases are equal in estimated number of units of capacity • Prioritization of Type 5s and Type 4s (optional) within this process will be used for assigning priority order within the CLEC Production Releases.³ • Type 5s and Type 4s will be implemented into the CLEC Production Release being scoped for prioritization within 60 weeks of prioritization.
42	6.0 – Part 4	D 75-	Staff recommends the following language be included in the Change Control Process:

²A set number of maintenance releases will be provided as well. Maintenance releases are primarily intended for implementation of defects.

³Type 4s and 5s (optional) will also be assigned to BST Production Releases outside of this process.

Item	CCP Section	Status Page	Staff Recommendation
		76	<p>During the Release Package Meeting, BellSouth will present its proposed release package for the release being scoped and provide a planning view of remaining change requests that may be scheduled for the next CLEC production release(s).⁴</p> <p>BellSouth may develop several variations of release packages.</p> <p>The CLEC's prioritization will be used for order of implementation into this CLEC Production Release. The order of implementation may be altered only with CLEC concurrence.</p>
43	6.0 – Part 5	D 76- 77	<p>Staff recommends the following language proposed by CLECs be included in the Change Control Process: <u>Part 5: Release Capacity Forecasting, Allocation, and Reporting</u></p> <p>Forecast and Planning Information: In order to facilitate joint planning for long term development between BellSouth and CLECs and production support capacity plans, two OSS development forecasts and specifications will be shared. Each quarter, BellSouth will provide a release capacity forecast covering the remainder of the current calendar year and the following calendar year including high level estimates of when BellSouth intends to release, upgrade or retire its various operational support systems. At the same time and for the same period of time BellSouth will provide an outlook with high-level description of the items to be included in each upgrade release. Included in this outlook will be the size in units of the release capacity and the size in units of the capacity remaining within the release.</p> <p>For Type 3 Industry changes, BellSouth will provide the preliminary feature sizing model at the beginning of the calendar year. The remaining annual capacity will be allocated according for the defined categories per the Change Control Process document.</p> <p>All release capacity not required to implement Type 2, Type</p>

⁴ Capacity estimates for change requests and releases will be used as a guide in determining how many change requests will be assigned to these releases.

Item	CCP Section	Status Page	Staff Recommendation
			<p>3, and Type 6 changes will be utilized for the implementation of Type 4 and 5 changes. The CLEC prioritization will include an order of implementation that BellSouth may alter only with CLEC concurrence.</p> <p>Pre-Release Capacity</p> <p>BellSouth will provide preliminary unit measurement estimates accompanying each change request that can be used by the CLECs during prioritization. BellSouth will provide the total number of units available for a specific release to be utilized as a tool for prioritization. Total number of units will be provided as follows:</p> <p>Total Release Units</p> <ul style="list-style-type: none"> • Units required to perform release maintenance • Units required to implement public switched network mandates such as NPA overlays and Number Pooling • Units required to implement Type 6 Change Requests • Units required to implement Type 2 Change Requests • Units required to implement Type 3 Change Requests • Remaining units available for the prioritization and implementation of Type 4 and Type 5 Change Requests. <p>Appendix I-A will be used to present this information.</p>
44	10.0	O 88- 96	This item is still being discussed among the parties.
45	11.0 – Terms & Definitions –	O 104	This item is still being discussed among the parties.

Item	CCP Section	Status Page	Staff Recommendation
	Release - Production		
46	11.0 – Terms & Definitions- Release Capacity Measurement	D 104	<p>Staff recommends the following language proposed by CLECs be included in the Change Control Process: RELEASE CAPACITY MEASUREMENT - PRE-RELEASE CAPACITY</p> <p>BellSouth will provide preliminary unit measurement estimates accompanying each change request that can be used by the CLECs during prioritization. BellSouth will provide the total number of units available for a specific release to be utilized as a tool for prioritization. Total number of units will be provided as follows:</p> <p>Total Release Units</p> <ul style="list-style-type: none"> • Units required to perform release maintenance • Units required to implement public switched network mandates such as NPA overlays and Number Pooling • Units required to implement Type 6 Change Requests • Units required to implement Type 2 Change Requests • Units required to implement Type 3 Change Requests • Remaining units available for the prioritization and implementation of Type 4 and Type 5 Change Requests. <p>Appendix I-A will be used to present this information.</p>
47	Appendix D	O 109 - 110	This item is still being discussed among the parties.
48	Appendix I-A & I-B	D 117 -	Staff recommends approval of the CLEC's proposal.

Item	CCP Section	Status Page	Staff Recommendation
		118	
49	11:0 – Terms & Conditions – Defect Definition	D 101	Staff's recommendation is the same as for Item 8a.

III. ORDERING PARAGRAPHS

The Commission finds and concludes that the proposed amendments to the performance measurements, benchmarks and retail analogs, and the enforcement mechanisms set forth above are reasonable and appropriate and should be adopted pursuant to Georgia's Telecommunications and Competition Development Act of 1995 and Sections 251 and 252 of the Telecommunications Act of 1996. Pursuant to this same authority, the Commission hereby adopts Staff's recommendations on BellSouth's CCP, including both the proposed modifications to the language of the CCP and the proposed terms and conditions that relate to the CCP. The Commission finds that modifying BellSouth's CCP in accordance with Staff's recommendation should effectively maintain nondiscriminatory OSS.

WHEREFORE IT IS,

ORDERED, that the Commission hereby adopts the Staff's recommended modifications, as reflected in Exhibit 1 and the body of this Order, to the performance measurements, benchmarks and retail analogs, and the enforcement mechanisms for BellSouth.

ORDERED FURTHER, that the Commission hereby adopts the Staff's recommended modifications to BellSouth's CCP, including both the proposed modifications to the language of the CCP and the proposed terms and conditions that relate to the CCP.

ORDERED FURTHER, that a motion for reconsideration, rehearing, or oral argument or any other motion shall not stay the effective date of this Order, unless otherwise ordered by the Commission.

ORDERED FURTHER, that jurisdiction over these matters is expressly retained for the purpose of entering such further Order or Orders as this Commission may deem just and proper.

The above by action of the Commission in Administrative Session on the 2nd day of July 2002.

Reece McAlister
Executive Secretary

David Burgess
Chairman

Date

Date